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UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT OF NEW YORK

	X
In re	:
	:
DOWLING COLLEGE,	:
f/d/b/a DOWLING INSTITUTE,	:
f/d/b/a DOWLING COLLEGE ALUMNI	:
ASSOCIATION,	:
f/d/b/a CECOM,	:
a/k/a DOWLING COLLEGE, INC.,	:
	:
Debtor.	:
	X

**DEBTOR'S MOTION FOR A BRIDGE ORDER GRANTING
LIMITED EXTENSION OF DEBTOR'S EXCLUSIVE PERIODS
PENDING A HEARING ON THE DEBTOR'S MOTION FOR AN
ORDER EXTENDING EXCLUSIVE PERIODS TO FILE A
CHAPTER 11 PLAN AND SOLICIT ACCEPTANCES
THEREOF PURSUANT TO 11 U.S.C. § 1121(d)**

**TO THE HONORABLE ROBERT E. GROSSMAN,
UNITED STATES BANKRUPTCY JUDGE:**

Dowling College ("Dowling" or the "Debtor"), debtor and debtor-in-possession in the above-captioned chapter 11 case (the "Chapter 11 Case"), submits this motion (the "Motion") for the entry of a bridge order extending the exclusive periods during which the Debtor may file a chapter 11 plan and solicit acceptances thereto through and including the Court's hearing on and

adjudication of the *Debtor's Motion for an Order Extending Exclusive Periods During Which the Debtor May File a Chapter 11 Plan and Solicit Acceptances Thereto* (the “Motion to Extend Exclusivity”) [DE 256], currently set for April 26, 2017 at 1:30 p.m. (prevailing Eastern Time), and respectfully sets forth as follows:

JURISDICTION

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334, Administrative Order No. 264 titled “In the Matter of The Referral of Matters to the Bankruptcy Judges” of the United States District Court for the Eastern District of New York (Weinstein, C.J.), dated August 28, 1986, and Administrative Order No. 601 of the United States District Court for the Eastern District of New York (Amon, C.J.), dated December 5, 2012.
2. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b).
3. Venue of this proceeding and this Motion is proper pursuant to 28 U.S.C. §§ 1408 and 1409.
4. The statutory predicates for the relief requested herein is 11 U.S.C. §§ 105(a) and 1121(d) of the Bankruptcy Code.

BACKGROUND

5. On November 29, 2016 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Eastern District of New York (the “Court”).

6. The Debtor continues to manage its property as a debtor in possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code.
7. On December 9, 2016, the United States Trustee appointed Ultimate Power Inc., Linda Arditto and Lori Zaikowski to the Official Committee of Unsecured Creditors (the “Creditors”

Committee"). Later that day, the Creditors' Committee selected SilvermanAcampora LLP as its proposed general bankruptcy counsel.

8. Prior to the Petition Date, the Debtor retained Robert S. Rosenfeld of RSR Consulting, LLC to perform the functions and hold the title of Chief Restructuring Officer (the "CRO"). The CRO has taken over as the day-to-day manager of the Debtor and is responsible for managing the Debtor as debtor-in-possession in this Chapter 11 Case, assisting in the formulation, preparation and consummation of a plan of liquidation and performing such other duties customary to a chief restructuring officer.

9. The events leading up to the Petition Date and the facts and circumstances supporting the relief requested herein are set forth in the *Declaration of Robert S. Rosenfeld, Chief Restructuring Officer of the Debtor, Pursuant to Local Bankruptcy Rule 1007-4 in Support of First Day Motions* (the "First Day Declaration") [DE 23].

RELIEF REQUESTED

10. The Debtor's exclusive periods to file a chapter 11 plan and seek acceptances and rejections thereof (collectively, the "Exclusive Periods") expire on March 29, 2017 and May 30, 2017, respectively. On March 28, 2017, the Debtor filed its Motion to Extend Exclusivity wherein the Debtor seeks a one hundred and twenty (120) day extension of these Exclusive Periods. The Motion to Extend Exclusivity is scheduled to be heard by the Court on April 26, 2017 at 1:30 p.m. (prevailing Eastern Time).

11. As the Debtor's time to file a chapter 11 plan will expire prior to the April 26, 2017 hearing, the Debtor seeks the entry of a bridge order which will provide that the Exclusive Periods shall be continued up to and including the hearing to consider the Motion to Extend Exclusivity and the Court's adjudication thereof.

12. The Debtor believes that this short extension of time contemplated in the proposed bridge order will not prejudice the rights of any party.

NO PRIOR REQUEST

13. Except as set forth in the Motion to Extend Exclusivity, no previous request for the relief sought herein has been made to this or any other court.

NOTICE

14. Given the ex parte nature of the relief sought herein, no notice of this Motion will be given.

WHEREFORE, the Debtor respectfully requests that this Court enter an order, substantially in the form of the proposed order annexed hereto as Exhibit A, and for such other and further relief as the Court determines to be just and proper.

Dated: New York, New York
March 29, 2017

**KLESTADT WINTERS JURELLER
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